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Attorneys for Mark Dannels, Pat Downing, Kris Karcher, Shelly McInnes,
Raymond McNeely, Kip Oswald, Michael Reeves, Sean Sanborn,
Eric Schwenninger, Chris Webley, Anthony Wetmore, Craig Zanni,
David Zavala, City of Coquille, City of Coos Bay, Coos County, Oregon,
and the Estate of David E. Hall

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

Nicholas James McGuffin,
as an individual and as guardian
ad litem, on behalf of S.M., a minor,

Plaintiffs,

v.

Case No. 6:20-cv-01163-MK

**Response to Plaintiffs' First
Set of Requests for Admissions
and Interrogatories
to Defendant Chris Webley**

Mark Dannels, Pat Downing, Susan
Hormann, Mary Krings, Kris Karcher,
Shelly McInnes, Raymond McNeely,
Kip Oswald, Michael Reaves, John
Riddle, Sean Sanborn, Eric Schwenninger,
Richard Walter, Chris Webley, Anthony
Wetmore, Kathy Wilcox, Craig Zanni,
David Zavala, Joel D. Shapiro as Administrator
of the Estate of David E. Hall, Vidocq Society,
City of Coquille, City of Coos Bay, and Coos County,

Defendants.

Nicholas James McGuffin, as an
Individual and as guardian ad litem,
on behalf of S.M., a minor,

Plaintiffs,

v.

Oregon State Police,

Defendant.

Case No. 3:21-cv-01719-MK
(Trailing Case)

Defendant Chris Webley hereby submits his response to Plaintiffs' First Set of Requests for Admission and Interrogatories as follows:

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Admit that your handwriting appears on the document attached as Attachment 1.

ANSWER: Admit.

REQUEST FOR ADMISSION NO. 2: Admit that you created the handwritten notes and colored highlighting on the document attached as Attachment 2.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 3: Admit that your handwriting appears on the document attached as Attachment 3.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 4: Admit that your handwriting appears on the document attached as Attachment 4.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 5: Admit that your handwriting appears on the document attached as Attachment 5.

ANSWER: Deny.

INTERROGATORIES

INTERROGATORY NO. 1: Is it your position that there was probable cause to arrest and charge Nicholas McGuffin with the murder of Leah Freeman? If so, state the factual basis for your position.

ANSWER: Yes; this position is based upon the fact that a Grand Jury for Coos County returned a true bill on charges involving the death of Leah Freeman, which was the basis of the indictment and arrest of Nicholas McGuffin.

Dated: September 6, 2024.

Respectfully submitted,

By: /s/ Sarah R. Henderson
FRANZ & HENDERSON
Sarah R. Henderson
OSB #153474
(541) 741-8220
**Of Attorneys for Defendants Mark Dannels,
Pat Downing, Kris Karcher, Shelly McInnes,
Raymond McNeely, Kip Oswald, Michael
Reeves, Sean Sanborn, Eric Schwenninger,
Chris Webley, Anthony Wetmore, Craig Zanni,
David Zavala, and City of Coquille, City of
Coos Bay, Coos County, Oregon, and the
Estate of David E. Hall**

VERIFICATION

I declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge and belief.

DATED this 6th day of September 2024.

/s/ Chris Webley
Chris Webley

ATTACHMENT 1

Hjördis^{A.} Lindegren 5-19-10 e library
 7-8-58 541-396-2258 290-6216
 551 W. 4th Pl. 22 yrs.

1300

- Avio survivor fan.
- Watching survivor on TV. - Brother over w/ dog.
- ~~- Night Rudy got voted off. Upset - wrong people~~
- Watched till end of show. Brother got up - took dog for walk. Got back.
- Returned 1/2 hr. later.
- Left around 2100 - returned approx. 2130.
- May have left a few minutes before end but after Rudy was off.
- Recall John commenting about "uncontrollable juveniles" after coming back. Leah yelling at somebody.
- Neighbor, Dez, told Hjördis Leah is fight w/ people in house.

* Neighbor

- Dez Couch / wife Barbara - daughter lives w/ house now
- daughter:
- Elm / w. 4th pl. facing Elm. 446 N. Elm.
- ~~440-63~~ 91063 N. Bark - Crockett
- John stopped / talked w/ Dez for while. Continued walk & passed people in front of house (Leah / Rick).